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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

AMERICAN CIVIL LIBERTIES UNION; and AMERICAN CIVIL LIBERTIES UNION FOUNDATION) 11-cv-3786 (RMB)) ECF CASE
Plaintiffs, v.)) NOTICE OF PLAINTIFFS) MOTION FOR SUMMAR) JUDGMENT
U.S. DEPARTMENT OF HOMELAND SECURITY; and U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT)))
Defendants.)))

PLEASE TAKE NOTICE that upon the accompanying: (i) Declaration of Richard G. Leland in Support of Plaintiffs' Motion for Summary Judgment, dated February 27, 2013, with attached exhibits; (ii) Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment; (iii) Plaintiffs' Statement of Material Facts Pursuant to Local Rule 56.1; and (iv) Declaration of Michael Tan, dated February 27, 2013, plaintiffs American Civil Liberties Union and American Civil Liberties Union Foundation (collectively, the "Plaintiffs") will move this Court before the Honorable Richard M. Berman, at a date and time to be set by the Court, in Courtroom 12D of the United States District Courthouse at 500 Pearl Street, New York, New York 10007, pursuant to Federal Rule of Civil Procedure 56, for an order granting Plaintiffs summary judgment against Defendants U.S. Department of Homeland Security

and U.S. Immigrations and Customs Enforcement in the above captioned action and for such other and further relief as the Court deems just and proper.

Dated: New York, New York

February 27, 2013

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